

*Kenneth J Taggart*  
*45 Heron Rd*  
*Holland, Pa 18966*

## COMPLAINT

October 29, 2013

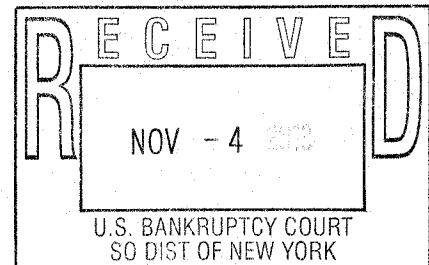
**Kathleen Kane, Attorney General, State of Pennsylvania**  
**Office of Attorney General**  
**Bureau of Consumer Protection**  
**15th Floor, Strawberry Square**  
**Harrisburg, PA 17120**

**United States Attorney General, Eric Holder**  
**U.S. Department of Justice**  
**950 Pennsylvania Avenue, NW**  
**Washington, DC 20530-0001**

**Pennsylvania BAR Association**  
**100 South Street,**  
**Harrisburg, PA 17101**

**Office of Attorney Ethics**  
**New Jersey BAR Association**  
**840 Bear Tavern Road,**  
**West Trenton, NJ 08628**

**Department of Housing & Urban Development**  
**Frank Aeillo**  
**100 Penn Sq East, Suite 1005**  
**Philadelphia, Pa. 19107**



RE: GMAC Mortgage, LLC v. Kenneth J Taggart, Pro Se  
Case No 09-25338 (Court of Common Pleas, Montgomery County, Pa)

Gentleman,

This is a **"Formal Complaint"** to all parties in which this complaint is addressed. This complaint is regarding false, fraudulent, and "Robo-Signed" documents that have been used and submitted to The Court of Common Pleas, in Montgomery County, Pennsylvania in a foreclosure case. I am a defendant in the case in which GMAC Mortgage, LLC filed an illegal foreclosure.

**GMAC Mortgage, LLC**, via their counsel, filed an illegal foreclosure on my property on August 14, 2009. It was later discovered, in March 2012, that the **"Verification to Complaint"** was a "Robo-Signed" **fraudulent document** submitted to the court and *produced by "Jeffrey Stephan"*. It was also discovered later that the **"Assignment of Mortgage"** relied on was **fraudulent** for several reasons.

**GMAC Mortgage, LLC & Counsel continue to pursue foreclosure case with known Fraudulent Verifications & Documents**

Despite their knowledge and notification that their affidavit filed with the court was fraudulent, GMAC and their attorneys are still pursuing foreclosure with known fraudulent documents. See attached letters of notifications and depositions provided by known "Robo-Signer to GMAC", Jeffrey Stephan. See attached Exhibits showing notifications to counsel at GMAC and attached *Depositions from Stephan admitting Documents were Fraudulent.*

**(See Exhibits notifying GMAC & Counsel + Depositions from Jeffrey Stephan)**

**Known Fraudulent "Assignment of Mortgage" filed with "The Montgomery County Recorder of Deeds"**

This complaint also cites fraudulent, "Robo-Signed, documents submitted with **"The Recorder of Deeds in Montgomery County, Pennsylvania"**. **GMAC Mortgage, LLC**, The Mortgage Electronic Registration Systems Inc, and Attorneys for GMAC Mortgage **have produced, and filed fraudulent "Assignment of Mortgage"** documents with the Recorder of Deeds.

The Fraudulent **"Assignment of Mortgage"** that was **produced by "Michelle Bradford"**, representing both the Foreclosure Mill of Phelan, Hallinan & Schmeig, who filed the illegal foreclosure; Michelle Bradford represented the alleged previous owner of the mortgage, "The Mortgage Electronic Registration Systems Inc. a/k/a MERS" and also represented the assignee who filed the illegal foreclosure. An obvious **"Conflict of Interest"** on the part of Michelle Bradford, The Mortgage Electronic Registration Systems Inc., & The Phelan Firm. She knowingly represented two different parties in the same transaction, GMAC Mortgage, LLC and the Mortgage Electronic Registration Systems, Inc.

**MERS / Mortgage Electronic Registration Systems Inc. Assignments Are Fraudulent**

**MERS Assignments are Fraud – they do not comply with**

**Pennsylvania Law** pursuant "The Montgomery County Recorder of Deeds", Nancy Becker, and are a deceptive shell game to deceive borrowers and the public of true ownership of mortgages. Mortgage Electronic Registration Systems, Inc. does not record all transfers pursuant "Pennsylvania Property Recording Laws" and deceive borrowers and the public as to the real owner of a mortgage, the existence of a mortgage, or the true owner of the mortgage.

### **Fraud on The Court (s)**

This is notwithstanding the fact that GMAC, and "The Foreclosure Mill" have filed a fraudulent foreclosure, with fraudulent documents committing "Fraud on the Court" by asserting ownership of a mortgage with fraudulent documents.

***As of today's date, GMAC and their attorneys pursue their illegal foreclosure with known fraudulent documents and committing "Fraud on the Court".***

### **Fraudulent documents Produced:**

#### ***Verification of Mortgage***

Attorneys in this case have been knowingly committing "Fraud on The Court" by pursuing a foreclosure case based on fraudulent Robo-Signed documents by "Jeffrey Stephan", a known Robo-Signer, who produced fraudulent documents. Attached is a list of attorneys in this case who have known about the fraudulent affidavits and potentially other fraudulent documents for quite some time, but refuse to withdraw the documents or inform the court of their fraudulent nature. Attorneys in this case are admitted in both Pennsylvania & New Jersey.

#### ***Fraudulent "Assignment of Mortgage"***

A Fraudulent "Assignment of Mortgage" was produced by "Michelle Bradford", representing both the Foreclosure Mill of Phelan, Hallinan & Schmeig, who filed the illegal foreclosure; Michelle Bradford represented the alleged previous owner of the mortgage, "The Mortgage Electronic Registration Systems Inc. a/k/a MERS" and also represented the assignee who filed the illegal foreclosure.

Counsel in this case are well aware of the Fraudulent documents and still

hold to the court that they are legal documents representing an "Affidavit of Verification" and "Mortgage Assignment" in the case.

Even if counsel attempts to plead ignorance that they were not aware of this, or it was merely overlooked, I have attached letters notifying counsel of the fraud, but to no avail. Attached is a copy of the docket indicating the counsel who have entered an entry of appearance and continue the fraud as if it were business as usual.

**Attorneys who have entered an appearance on the record are as follows:**

From the Law Firm of : Fleischer, Fleischer, & Suglia:  
Plaza 1000 at Main St  
Suite #208  
Voorhees, New Jersey, 08043

The following counsel from this firm is representing GMAC in this case:

Brian Fleischer  
Nicloa Suglia  
Ahmed Soliman,  
Allison Domowich

From the Law Firm of: Phelan, Hallinan & Schmieg, LLC.  
1617 JFK Blvd, Suite #1400  
One Penn Center  
Philadelphia, Pa 19103

The following counsel from this firm is representing GMAC in this case:

Jennie Davey  
Francis Hallinan  
Jaime McGuinness  
Lawrence Phelan,  
Daniel G. Schmieg

*Michelle Bradford – Attorney from Phelan & Assistant  
Secretary & Vice President of Mortgage Electronic Registration  
Systems. Signed for both parties on alleged Assignment of  
Mortgage ..direct conflict of interest.*

From the Law firm of: Reed Smith LLP

2500 One Liberty Place  
1650 Market St  
Philadelphia, Pa 19103

The following counsel from this firm is representing GMAC in this case:

Dianne Bettino  
Maria T Guerin  
Barbara Hager -Kiely

From the Law firm of: Saul Ewing, LLP  
1500 Market St, 38<sup>th</sup> Floor  
Philadelphia, Pa 19102

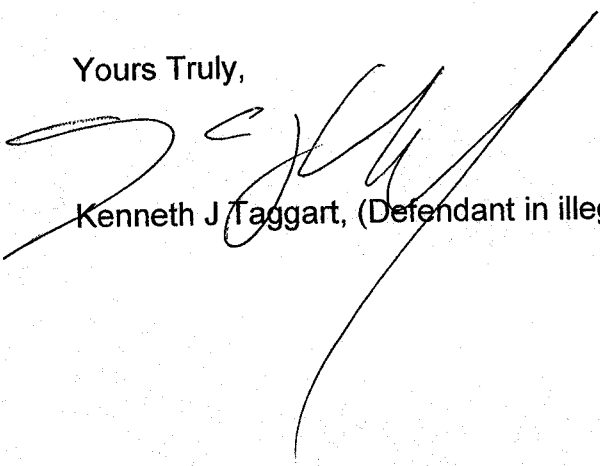
The following counsel is representing Jeffrey Stephan/GMAC in this case:

Gregory Schwab  
Saul Ewing, LLP  
1500 Market St  
38<sup>th</sup> Floor  
Philadelphia, Pa 19102

Please contact me to let me know of your intentions. You may contact me  
to discuss any or all of these issues by phone. You may contact me at ~~██████████~~-  
~~██████████~~.

*Redacted*

Yours Truly,



Kenneth J Taggart, (Defendant in illegal foreclosure case)